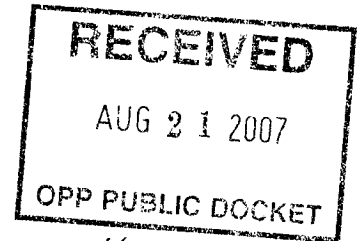

**Big Wood Canal Company
American Falls Reservoir District No. 2
112 South Apple St.
Shoshone, Idaho 83352
Tel (208) 886-2331 Fax (208) 886-2010**

August 13, 2007

**Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460-0001**



Re: Docket Id Number EPA-HQ-Opp-2007-0588

I would like to make public comment concerning the risk assessments for Magnacide H herbicide.

As an operator of an Irrigation District aquatic vegetation in irrigation canals is a serious issue. Infestations of these weeds restrict the delivery of water to farmers who depend on the water for irrigation of crops, which is there livelihood. Loss of the ability to deliver water in adequate amounts due to aquatic plant growth restricting the channel, creating additional loss, seepage and sometimes breaches of the system, can cause major losses of income to these farms. Water is a precious natural resource and anything we can do to help cut back on seepage and evaporation loss leaves more available for other uses.

Without the use of a chemical such as Magnacide H, we would be forced to use mechanical means to remove the aquatic weed growth. This is a very expensive way to deal with the problem, which creates water quality issues and damage to the integrity of the conveyance system.

Our District has used Maganacide H for the past 25 years without any sign of environmental harm to birds or other animals in the area. During that time we have irrigated approximately 100,000 acres of farm land without any recorded damage to crops. We have tried other products but are worried about the residue left after applications of these products.

In 25 years of use, we have find it very to believe that Magnacide H could travel 61 miles. Our experience shows a travel distance dependent on water quality, weed growth and water temperature, an average distance of more in the range of 4 to 6 miles, however it is very hard to put an exact travel distance on an application. True it is toxic to fish, but our canals are irrigation canals not fisheries and only an occasional fish is ever found after an application and these would not survive within

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the canal system due to the design of the system. These canals are dry 5 months of the year and therefore can hardly be classified as fisheries. There is no chronic exposure to fish as they are either dead or alive.

We do everything we can to minimize volatilization of the product as it is expensive and we don't want to waste any material, therefore we make sure it is mixed well within the water. Nothing can stay around the vapors, including our applicators if it isn't mixing well in the water.

Our District follows the label, regulations and every other law applying to the applications of pesticides. Applying Aquatic herbicides is not as difficult as your risk assessment makes it seem. We move water for a living and understand the complexities of our system. We deliver only water for irrigation and in the last 25 years have never had an incident of any kind. Without this chemical our water cost would more than double to the farmer and quite frankly with the present economic outlook for agriculture they can't afford any additional expense. Not only that, but a large portions of our farmers use sprinkler systems and would be unable to operate these system without clean water. Without Magnacide H our farmers irrigation systems would be unable to operate and shut down completely.

To wrap up, in 25 years Magnacide H has proven to be a safe, dependable way to control aquatic weed growth. We like it because it leaves no residue, and it controls weed growth without the detrimental effect on water quality of mechanical methods and some other chemicals.

I want to Thank You for the opportunity to comment on this product.

Sincerely,

A handwritten signature in black ink, appearing to read "Lynn Harmon", written in a cursive style.

**Lynn Harmon,
General Manager**